

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

UNITED STATES, et al.,)	
)	
Plaintiffs,)	
v.)	No. 1:23-cv-00108-LMB-JFA
)	
GOOGLE LLC,)	
)	
Defendant.)	

**DECLARATION OF MR. BARRY DICKEY IN SUPPORT OF PLAINTIFFS’
RESPONSE TO
GOOGLE’S MOTION TO SEAL**

Mr. Barry Dickey, pursuant to 28 U.S.C. § 1746 hereby declares as follows:

1. I am over 21 years old and am competent to testify about the matters in this Declaration based on my personal knowledge.
2. I am Chief of Strategic Marketing for the United States Air Force and submit this Declaration in support of Plaintiffs’ Response to Google’s Motion to Seal.
3. Plaintiffs’ Exhibit 91, ECF No. 672-5, is an excerpt of a true and accurate conformed copy of the Air Force’s advertising contract with GSD&M. Pricing associated with specific contract line items is not generally available to the public and proprietary commercial information. Disclosure of this pricing information would compromise the Air Force’s future negotiating positions.
4. Defendant’s Exhibit 75, ECF No. 602-5, is a true and correct copy of a 2022 media plan showing digital media strategy and recommendations relative to a certain ad campaign, a Comment Resolution Matrix showing the Air Force’s feedback to the plan, and a cover email noting that the ad agency incorporated the feedback and requesting Air Force’s

approval of the updated plan. The Comment Resolution Matrix is commercially sensitive in that, if disclosed, contractors could gain an unfair competitive advantage in understanding the Air Force's acquisition strategy and planning. Also, data on the last slide of this exhibit is not generally available to the public and contains detailed information on the recruiting efforts of the Air Force which could be used in aggregate by adversaries to compile intelligence on the Air Force's capabilities..

5. Defendant's Exhibit 139, ECF No. 709-7 is an invoice from GSD&M. Names and signatures of Air Force staff included in the documents cited is not widely published or available to the general public as a matter of course and making it available on the public docket threatens to disrupt orderly and efficient agency operations.

6. Contact information for Air Force staff included in the documents cited in this declaration is not widely published or available to the general public as a matter of course and making it available on the public docket threatens to disrupt orderly and efficient agency operations.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 14, 2024.

Signed: 

BARRY A. DICKEY

County and State: Guadalupe County, TX